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UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

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In re

Case No.: 19-44751-CEC

1934 BEDFORD LLC,

Proceedings for
Reorganization under
Chapter 11

Debtor.
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MOTION TO RETAIN IMSPIEGEL LLC
AS THE DEBTOR’S ACCOUNTNANTS

TO: HON. CARLA E. CRAIG
UNITED STATES CHIEF BANKRUPTCY JUDGE

1934 Bedford LLC, Debtor and Debtor in Possession (“Bedford” or the
“Debtor”), represents:

1. The Debtor requests that this Court enter orders, pursuant to 11 U.S.C. § 327, authorizing the Debtor to retain IMSPIEGEL LLC (“IMSPIEGEL”), as its accountants in this case (the “Motion”).

BACKGROUND

2. An involuntary petition for relief under chapter 11 of the Bankruptcy Code was filed against Bedford on August 2, 2019.
3. On September 12, 2019, Bedford consented to the entry of an order for

relief under chapter 11 of the Bankruptcy Code.

4. The order for relief was entered on October 2, 2019.
5. Bedford continues in the operation of its business and control of its property as debtor in possession, pursuant to 11 U.S.C. §§ 1108 and 1109.
6. The Debtor own, operates and develops a mutli-unit building in Brooklyn, New York.
7. No committee of unsecured creditors has been appointed in this case.
8. This Court has jurisdiction over this matter, pursuant to 28 U.S.C. §§ 1334 and 157.
9. This matter is a "core proceeding" as that term is defined by 28 U.S.C. § 157.
10. This matter concerns a “public right.”
11. This district is the appropriate district to consider this Motion, pursuant to 28 U.S.C. § 1408.

RETAINING IMSPIEGEL

12. The Debtor wants to retain the accounting firm of IMSPIEGEL with offices at 1419 East 101st Street, Brooklyn, NY 11236 as its accountants.
13. The Debtor believes that IMSPIEGEL is well versed in the the matters on which it is to be retained and is qualified to perform the accounting services needed by the Debtor in this case
14. After conferring with Ira Spiegel, the Debtor believes that IMSPIEGEL can

provide the services the Debtor needs, does not hold or represent an adverse interest to the estate, and is a disinterested person

SERVICES TO BE RENDERED

15. The Debtor believes it is necessary to retain IMSPIEGEL to render the following services:
- A.) Monitoring the activities of the Debtor.
 - B.) Assisting in or the preparation of and/or reviewing monthly operating reports, budgets and projections.
 - C.) Reviewing the filed claims for reasonableness against the Debtor's records and filing schedules.
 - D.) Interacting with the Creditors' Committee and its retained professionals (the "Creditors"), should one be appointed.
 - E.) As required, attending meetings with the Debtor and Counsel, meetings with the Creditors and Court hearings.
 - F.) Assisting in the preparation of the Plan of Reorganization and the Disclosure Statement.
 - G.) Other assistance as the Debtor and counsel may deem

necessary.

16. IMSPIEGEL anticipates that these services will require between \$5,000 to \$8,000 in professional services.

TERMS OF RETENTION

17. The Debtor and IMSPIEGEL agreed to the following terms for IMSPIEGEL's compensation.
18. IMSPIEGEL shall bill the Debtor for legal services at its regular hourly rates of \$245.00 per hour.
19. These fees are subject to change.
20. IMSPIEGEL shall also be reimbursed for its disbursements incidental to it providing services for the Debtor in this case.
21. IMSPIEGEL received no initial retainer.
22. IMSPIEGEL shall make applications for the payment and allowance of fees and disbursements, pursuant to 11 U.S.C. §§ 330 and 331 and Fed. R. Bankr. P. 2016.
23. The Debtor consents to IMSPIEGEL receiving compensation on a monthly basis pursuant to any procedure of this Court permitting IMSPIEGEL to receive compensation on a monthly basis
24. No prior application has been made for the relief sought herein.

WHEREFORE, it is requested that an order be entered authorizing the retention of ISPEIGEL, LLC, as the Debtor's accountants herein, pursuant

to the terms stated herein, together with such other and further relief as this Court deems proper.

Dated: New York, New York
October 16, 2019

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By___/s/Wayne M. Greenwald_Pres.
Wayne M. Greenwald